

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

United States Securities and Exchange Commission,	)	Civil Action
	)	0:11-cv-723-ADM-JSM
Plaintiff,	)	
v.	)	
Marlon Quan, Acorn Capital Group, LLC	)	
and Stewardship Investment Advisors,	)	<b>MOTION FOR LEAVE TO</b>
LLC,	)	<b>DEPOSIT FUNDS WITH THE</b>
Defendants,	)	<b>COURT AND TO DISMISS ASSET</b>
and	)	<b>BASED RESOURCE GROUP, LLC</b>
Asset Based Resource Group, LLC and	)	<b>AS A RELIEF DEFENDANT</b>
Florene Quan,	)	
Relief Defendants	)	
and	)	
Nigel Chatterjee, Court-Appointed	)	
Liquidator of Stewardship Credit Arbitrage	)	
Fund, Ltd., Putnam Green, Ltd., and	)	
SCAF I, Ltd.,	)	
Intervenor.	)	

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Pursuant to Rules 8(a), 12(b) and 67 of the Federal Rules of Civil Procedure and Rule 67.1 of the Local Rules of the United States District Court for the District of Minnesota and other applicable law, Asset Based Resource Group, LLC (“ABRG”) hereby moves the Court for leave to deposit funds with the Court and to dismiss ABRG as a relief defendant with prejudice. ABRG’s motion is based on the file, records and proceedings herein as well as ABRG’s memorandum of law, including affidavits and attached exhibits, filed herewith.

Dated: December 1, 2011

WINTHROP & WEINSTINE, P.A.

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